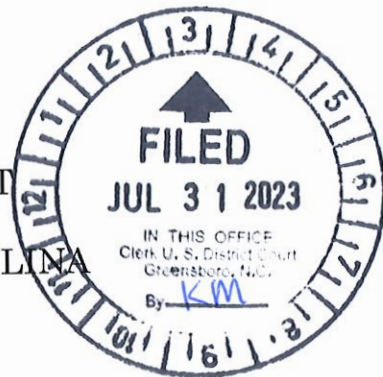


IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA :  
 :  
v. : 1:23CR 261 -1  
 :  
KIERRE ANTHONY CUTLER :

The Grand Jury charges:

COUNT ONE

On about October 16, 2022, in the County of Forsyth, in the Middle District of North Carolina, KIERRE ANTHONY CUTLER did knowingly distribute and attempt to distribute any child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(2)(A) and (b)(1).

COUNT TWO

From on or about October 16, 2022, continuing up to and including on or about October 27, 2022, the exact dates to the Grand Jurors unknown, in the County of Forsyth, in the Middle District of North Carolina, KIERRE ANTHONY CUTLER did knowingly possess any material which contained an

image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor and a minor who had not attained 12 years of age, which had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).

### FORFEITURE ALLEGATION

1. The factual allegations contained in this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

2. Upon conviction of one or more of the offenses alleged in this Indictment, the defendant, KIERRE ANTHONY CUTLER, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a), all visual depictions described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of the United States Code; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and any

property, real or personal, used or intended to be used to commit or promote the commission of the offense or any property traceable to such property.

3. The property subject to forfeiture pursuant to paragraph 2 above may include, but shall not be limited to, the following property of the defendant seized on or about October 27, 2022:

a. a gold in color Samsung cell phone with a cracked screen.

All in accordance with Title 18, United States Code, Section 2253, Rule 32.2, Federal Rules of Criminal Procedure, and Title 28, United States Code, Section 2461(c).

DATED: July 31, 2023

SANDRA J. HAIRSTON  
United States Attorney



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BY: K. P. KENNEDY GATES  
Assistant United States Attorney

A TRUE BILL:

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FOREPERSON 